

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

KENNA HAIGHT,
[DOB: 08/29/1986]

Defendant.

Case No. _____

COUNT ONE:

18 U.S.C. § 2261A(2)

(Cyberstalking)

NMT: 5 Years Imprisonment

NLT: 1 Year Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years Supervised Release

Class D Felony

\$100 Mandatory Special Assessment

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Cyberstalking)

1. From on or about October 1, 2013, and continuing thereafter to at least on or about December 11, 2013, within the Western District of Missouri and elsewhere, defendant KENNA HAIGHT, with the intent to kill, injure, harass, intimidate, or place under surveillance to kill, injure, harass, or intimidate another person, used any interactive computer service, electronic communication service, or electronic communication system of interstate commerce, to engage in a course of conduct, described in further detail in paragraphs 2 through 18 below, that caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress to a University of Missouri-Kansas City faculty member (hereafter "UMKC Instructor"), a member of the UMKC Instructor's immediate family, or the UMKC Instructor's spouse, all in violation of 18 U.S.C. § 2261A(2), and such crime was committed in violation of a

temporary or permanent civil or criminal injunction, restraining order, no-contact order, or other order described in 18 U.S.C. § 2266.

2. The defendant, KENNA HAIGHT, was formerly a student at the University of Missouri-Kansas City (hereafter “UMKC”).

3. At all times relevant to this Indictment, the UMKC Instructor was and is a faculty member at UMKC, and resides in the Western District of Missouri.

4. At all times relevant to this Indictment, UMKC was and is a public institution of higher education and research university located in Kansas City, Missouri, which is located in the Western District of Missouri.

5. Beginning at least in or about September, 2012, and continuing thereafter until in or about September, 2013, the Defendant repeatedly sent email messages to the UMKC instructor’s UMKC email address, despite several requests and warnings to stop sending messages or attempting to contact the UMKC Instructor.

6. Beginning on or about October 1, 2013, and continuing to on or about December 11, 2013, the Defendant repeatedly continued to contact, and attempt to contact, the UMKC Instructor, which included sending the emails further described in paragraphs 7 through 18. In total, the Defendant has sent over approximately 100 emails to the UMKC Instructor.

7. On or about October 1, 2013, using the kahfgc@umkc.edu email address, the Defendant sent the UMKC Instructor an email which included the following statement:

a. “I signed a release of information with my therapist Lenora to contact you so you can tell her. I told her in a session I keep having homicidal fantasies that me keep me up at night around you.”

8. On or about October 2, 2013, using the kahfgc@umkc.edu email address, the Defendant sent the UMKC Instructor an email which included the following statements:

a. “What was so important in your life this time last year you had to forever alter my life by changing your syllabus causing me to change my flight schedule this week and next last year? I may never be able to have kids because of you!!!”

b. “My life went down the drain when you changed your schedule and I changed my schedule to take your fucking stupid exam!!! Fuck you!!!!”

9. On or about October 2, 2013, using the kahfgc@umkc.edu email address, the Defendant sent the UMKC Instructor another email which included the following statements:

a. “Sleep with one eye open, if I decide I need revenge just in case I change my mind you will be dead on the 1st anniversary of the day I was raped because of you.”

b. “Am I in the backseat of your car ready to slit your carotid artery? Am I in the closet at your house in [city of the UMKC Instructor’s residence]? Am I underneath your car ready to cut your achilles heal? Are your lug nuts secure on your car??”

c. “You wont feel mentally safe anywhere until you quit UMKC and move to another state.”

10. On or about October 2, 2013, using the kahfgc@umkc.edu email address, the Defendant sent the UMKC Instructor another email which included the following statements:

a. “My sis and I watched the Jodi Arias trial and I thought about you.”

b. “The borderline in me obsessively thinks about killing people to prevent them from asking personal questions or barging into my private life. You barged into my private life on October 10th, 2012...you’ll survive.”

c. “I would like to make a public statement and get hair and makeup like Jodi. I don’t like her message...that was not no self defense. I wouldn’t claim self defense...I would just say I think authoritarians don’t deserve to live...here is my arm...inject the medication and put me out of my misery please...I am tired of being abused by authoritarians...”

11. On or about October 3, 2013, using the kahfgc@umkc.edu email address, the Defendant sent the UMKC Instructor an email which included the following statements:

a. “Mass hysteria among undergrad university faculty...you are my first subject.”

b. “I have you right where I want you. Mass hysteria. Glorious!”

12. On or about October 3, 2013, using the kahfgc@umkc.edu email address, the Defendant sent the UMKC Instructor another email which included the following statements:

a. “Look in the closet...am I in there? Uh no, check in the 5th floor health assessment lab...the 3rd room on the right. Am I in there? Come arrest me...”

b. “I cannot wait until you obsessively call the campus police convinced I am right behind you.”

13. On or about October 4, 2013, using the kahfgc@umkc.edu email address, the Defendant sent the UMKC Instructor an email which included the following statements:

a. “He wants a have a baby with me and he told me yesterday that if his first baby dies from a tubal from what you did to me...he wants to kill your first born in front of you.”

b. “I don’t want your first born daughter to suffer from your mistakes.”

c. “Technically, a wife is supposed to submit to her husband. If he wants to do things the old testament way and kill your first born for killing his first child with me...who am I to stop him?”

d. “As you tuck your children in at night, count your blessings.”

14. On or about October 21, 2013, using the kahfgc@umkc.edu email address, the Defendant sent the UMKC Instructor an email which included the following statements:

a. “Students do actually kill their teachers! I thought after I heard what you were concerned about in January was just the result of you watching too many movies on Lifetime but check this out...[internet link to New York Times story on October 22, 2013 about two people killed in a shooting at a Nevada middle school]”

b. “I never thought about killing you until Dr. Brotto put the thought in my head for me to chew on...then it got so strong...You need 3 things to commit murder, means, motive and opportunity.”

c. “There was one day I had means and opportunity but no motive that I knew of...you had just gotten home from a funeral...I would have hit the gas and ran you over across the lawn! Lucky for you I didn’t find out until February and UMKC had a vested interest in keeping you alive. You are very fortunate.”

d. “But I moved so I never got the chance to bitch slap you in front of people. That is really all I want to do...slap the shit out of you!”

e. “If I had known I would have killed you while I was your student and I had means, motive and opportunity!”

f. “I really can’t make you suffer the way I suffer unless I shoved a stainless steel baseball bat up your vagina and broke your spine or something. If I had a penis I would put a gun to your head and rape you and make you fear for your life.”

g. “I will never ‘get over it.’”

h. “I like to blackmail and seek revenge.”

i. “UMKC can burn in hell.”

15. On or about October 21, 2013, using the kahfgc@umkc.edu email address, the Defendant sent the UMKC Instructor another email which included the following statements:

a. “I technically have to threaten to kill you again for UMKC personnel to take me seriously.”

b. “You’re a fucking bitch whore and a liar.”

c. “You kicked me out of a state public university in fucking KCMO! Why was I so shocked? I investigated you! You live in [the city of the UMKC Instructor’s residence]...”

16. On or about October 25, 2013, using the kahfgc@umkc.edu email address, the Defendant sent the UMKC Instructor an email which included the following statements:

a. “...do you know what happens to people who piss me off?”

b. “I don’t deal with anger and irritation well...people who cross me wind up living to regret it. Want to be on my list???”

17. On or about November 1, 2013, using the kahfgc@umkc.edu email address, the Defendant sent the UMKC Instructor an email which included the following statements:

a. “I would have to shove a baseball bat up inside you as hard as I can to show you what you set me up for by changing your syllabus.”

b. “I seriously want to hurt you, you know that?”

18. On or about November 18, 2013, using the kahfgc@umkc.edu email address, the Defendant sent the UMKC Instructor an email which included the following statements:

a. “I have done somethings to you that I am not proud of that I will not admit via email. Just that I am sorry if you get hurt from all that you did. I am so sorry I did what I did. It is by far the worst thing I could ever do to someone. You would want to kill me if you knew what I did to you. Given that there is no obituary for you is relaxing.”

b. “Just watch your back 24/7. Don’t mess with students either. You don’t know who they know, who they will tell, what will happen to you...”

c. “...you may find yourself tied to your own bed in your own home begging for mercy. Or having your tongue cut out and your spinal cord cut paralyzing you for life so that you can never walk or speak again. Who knows what the universe has in store for you. If someone invades your home and cuts out your tongue...not my fault. Wishful thinking.”

A TRUE BILL.

_____/s/ TJ Nigro_____
FOREPERSON OF THE GRAND JURY

_____/s/ Matthew P. Wolesky_____
Matthew P. Wolesky
Assistant United States Attorney

Dated: ____12/11/13_____
Kansas City, Missouri